

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS (Worcester)**

Anthony Campbell,)
)
Plaintiff,)
vs.)
)
Isolation Technologies, Inc.)
Defendants)
)

Case No. 04-40236 FDS

**DEFENDANT, ISOLATION TECHNOLOGIES, INC'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and Rules 26.5 and 34 of the Local Rules of the United States District Court for the District of Massachusetts, defendant, Isolation Technologies, Inc. ("Isolation") hereby requests that within thirty (30) days after service the plaintiff, Anthony Campbell ("Campbell") produce for inspection and copying those documents and tangible things identified below which are within your custody, possession or control. The requested documents shall be produced at the offices of Cunningham, Machanic, Cetlin, Johnson & Harney, LLP, at 220 North Main Street, Natick, MA 01760. In the alternative, you may mail or deliver copies of all of the designated documents to William M. Zall, Esq., at the above-listed address within the thirty-day (30) timeframe.

When produced, the documents shall be segregated and identified by paragraph number of the request to which they are responsive. If no documents are in your custody, possession or control which are responsive to any particular request, you must so state that answer in response to the particular request identified by paragraph number.

If you refuse to produce any documents requested herein for any reason, including a claim of privilege or immunity from discovery with regard to any document requested herein, please provide the following information as to each such document: (a) its date; (b) the name and address of its author; (c) the name and address of each person listed as an addressee; (d) the

name and address of each person who has seen or reviewed each such document; (e) its general subject matter; (f) the basis for refusal to produce it; and (g) a summary of all facts and circumstances upon which the refusal is made.

If any document the production of which is sought by this request has been destroyed, please state, as to each such document, its date, author(s), recipient(s), and the date and circumstances of its destruction.

DEFINITIONS

1. The Uniform Definitions contained in Rule 26.5(C) of the Local Rules of the United States District Court for the District of Massachusetts are hereby incorporated by reference herein.
2. "Complaint". The term "Complaint". Term "Complaint" refers to the Complaint filed by Campbell in the United States District Court for the District of Massachusetts on November 12, 2004 in this action.
3. "Lawsuit". The term "Lawsuit" refers to the above-captioned civil action.

REQUESTED DOCUMENTS

1. All state and federal tax returns which you filed or were filed on your behalf, including attachments and/or schedules thereto, for those tax years 1999, 2000, 2001, 2002, 2003 and 2005.
2. All documents related in any way to your employment with any employer within **two years before working at Isolation Technologies, Inc.**, including but not limited to

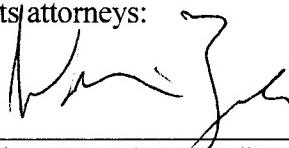
resumes, job applications, employment advertisements, correspondence to potential employers, performance appraisals, promotion notices, disciplinary notices, termination notices, etc. (Please note that the documents requested are those which were used or obtained ***at the time*** and of which you have copies.)

3. All documents related in any way to your search for employment with any employer **within two years before working at Isolation Technologies, Inc.**, including but not limited to resumes, job applications, employment advertisements, correspondence to potential employers, performance appraisals, promotion notices, disciplinary notices, termination notices, etc. (Please note that the documents requested are those which were used or obtained ***at the time*** and of which you have copies.)
4. All documents related in any way to your employment with any employer **since the time you ceased working at Isolation Technologies, Inc.**, including but not limited to resumes, job applications, employment advertisements, correspondence to potential employers, performance appraisals, promotion notices, disciplinary notices, termination notices, etc. (Please note that the documents requested are those which were used or obtained ***at the time*** and of which you have copies.)
5. All documents related in any way to your search for employment with any employer **since the time you ceased working at Isolation Technologies, Inc.**, including but not limited to resumes, job applications, employment advertisements, correspondence to potential employers, performance appraisals, promotion notices, disciplinary notices,

termination notices, etc. (Please note that the documents requested are those which were used or obtained **at the time** and of which you have copies.)

6. All documents which you submitted to any other agency or court of law concerning any allegations made in the your Complaint, including but not limited to those submitted to the Massachusetts Commission Against Discrimination and the Massachusetts Attorney General.

Isolation Technologies, Inc.
By its attorneys:

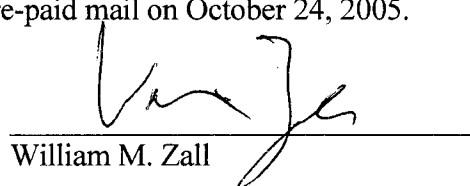


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Dated: Oct 24, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document (Defendant, Isolation Technologies, Inc.'s Second Request For Production of Documents to Plaintiff") was served upon the Plaintiff, Anthony Campbell, appearing pro se by first class, pre-paid mail on October 24, 2005.



William M. Zall

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